

EXHIBIT 11

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BY EMAIL

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August 14, 2020

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Brewer, Attorneys & Counselors
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Re: *National Rifle Association of America v. Cuomo et. al*, No. 18-cv-566-TJM-CFH
(N.D.N.Y.)

Dear Counsel:

In response to the NRA's Subpoena, dated January 25, 2019 (the "Subpoena") and further to our correspondence dated July 7, 2020, we are producing Everytown's production of documents bearing bates numbers EVTWN0000001 – EVTWN0000192 via the Weil Cloud.

Following our most recent exchanges in July, on July 28, 2020, the Court granted Defendants' request for a stay. [Dkt. no. 234]. However, following the August 10, 2020 conference and the Court's Order permitting the NRA to file its discovery motions, we learned that the stay no longer applies to third parties. Accordingly, Everytown is making its production at this time.

Everytown's production is in accord with our meet and confer discussions, and the agreement reached with your former colleague, Mr. Canoni. Specifically, based on a reasonable search, Everytown is producing: all communications between Everytown and Defendants, the Manhattan District Attorney's Office, Lockton, Chubb, Lloyd's and MetLife, the insurance regulators in the States of Massachusetts, New Jersey, Washington and California, concerning the NRA, Carry Guard, NRA-endorsed insurance programs and any purported discussion by Everytown to sever relationships with the NRA from January 1, 2017 to December 31, 2018. This is the exact scope of production proposed by the Brewer law firm.

To be clear, Everytown continues to stand on each of its specific objections to the Subpoena set forth at length in our February 25, 2019 and June 21, 2019 letters. Although you have conclusorily

Michelle J. Martin, Esq.

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contended that Everytown's objections are "boilerplate" and "meritless," you have repeatedly failed to explain why each of Everytown's objections are not well-founded and require further clarification. Indeed, you have failed to meaningfully respond or meet-and-confer about those objections. While Everytown does not believe the NRA is entitled to any further production, to the extent the NRA believes otherwise after reviewing today's production, we ask that you identify in detail the categories of additional documents the NRA seeks and provide a request-by-request explanation of the NRA's response as to each of Everytown's objections. Finally, we remind you of your obligations under Fed. R. Civ. P. 37 to meet and confer with us concerning any additional discovery you seek from Everytown.

Everytown produces these documents subject to and in accordance with the Confidentiality and Protective Order agreed to by the parties to the litigation and approved by Magistrate Judge Christian F. Hummel on April 24, 2019. Consistent with paragraphs 12 and 14 of the Confidentiality and Protective Order, Everytown is entitled to avail itself of the provisions and protections of the Order and by making this production, Everytown does not waive any privileges, objections, rights, or defenses that may be applicable to the documents or prevent Everytown from applying to the Court for relief.

We will provide access to the production via the Weil Cloud and will provide a password to open the zip files containing the production by separate email.

Sincerely,

s/ Caroline Hickey Zalka

Caroline Hickey Zalka